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Document reference number and title: (Recommendation from the MEP to SBM020)

A6.4 MEP012-A04: Draft Methodological tool: Fraction of non-renewable biomass (version 02.0)

Item	Section no. (as indicated in the document)	Paragraph/Table/Figure no. (as indicated in the document)	Comment (including justification for change)	Proposed change (including proposed text)
1	COVER NOTE	Paragraph 14	Conversion factors Conversion factors for charcoal and fuelwood are unsuitable for use in this tool, because the MoFuSS default values for fNRB include a 6:1 conversion factor. We recommend that the SBM retain the methodological tool's exclusion of conversion factors as suggested by comments.	-
2	INTRODUCTION	Paragraph 4	Because this tool links directly to the MoFuSS values, revision should occur when the model is updated, with a view to transforming the tool into a dynamic database for default values. It is understandable that the MEP recommends proceeding with an Article 6.4 mechanism-compatible methodological tool providing default fNRB values in the interim. However, in light of dynamic developments within the MoFuSS tool and the already foreseen updates to the default values resulting from this, as acknowledged in §7 and §24 of the cover note, the fNRB tool should at the very least integrate more regular updates. Doing so will increase the accuracy of the fNRB values and, therefore, the robust quantification of A6.4ERs.	"The methodological tool remains valid for three years, until DD Month YYYY, unless an earlier date applies if this methodological tool is revised(1) or withdrawn in accordance with the provisions in the "Procedure: Development, revision and clarification of methodologies and methodological tools" (A6.4-PROC-METH-001).(2) (1) The tool will be revised in accordance with updates to the (sub)national and urban values of the MoFuSS model (link: https://www.mofuss.unam.mx/), on which it is based. (2) See https://unfccc.int/sites/default/files/resource/A6.4-PROC-METH-001.pdf."

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3	APPLICABILITY	Paragraph 10	This paragraph currently conflates the requirements for how methodologies apply the tool with the conditions under which the tool is applied. For the latter, this is already specified in paragraph 9. In addition, while we welcome that the tool includes subnational default values for fNRB, Ghilardi & Bailis (2024) state that "it is difficult to provide generalized guidance about which values [(national or sub-national)] are appropriate because it depends on the specific context". We therefore propose adding justification requirements for both methodology proponents and activity participants, depending on whether the selection of the geographical scale is made by the methodology proponent or by the activity participant.	10. Where mechanism methodologies specify the use of this tool, they shall specify: (a) How the parameter fNRB,y is used in the mechanism methodology; (b) Which geographical scale for fNRB default values shall be used by activity participants, selecting from either: (i) A top-down approach, specifying whether activity participants shall apply a sub-national, national or multi-national default value. The mechanism methodology shall include a justification for the chosen geographical scale; (ii) A bottom-up approach, specifying the conditions for selecting among sub-national, national or multi-national default values, including a requirement to the activity participant for a justification for why a geographically narrower or broader option is selected based on the characteristics of the fuel(s) involved in an Article 6.4 activity;(5) and (c) How activity participants shall consider the uncertainty associated with the values of fNRB,y.

4	APPLICABILITY	Paragraph 10	Given that the default values in the tool diverge from the MoFuSS values found in Ghilardi & Bailis (2024), we must mention that there is insufficient provision for cases in which a substantial part of either fuelwood or charcoal is imported from other countries. It is vital that if a different country of origin (of charcoal) is known, ideally, the fNRB value is used that reflects the charcoal origin and also accurately accounts for transport emissions. Notably, during a meeting of the CDM Executive Board in June 2025 (EB 125), the CDM Methodological Panel recommended that "[...] fNRB for project activities in urban areas and in countries where more than 20% of the woodfuel consumed in the country is imported, the weighted average of the fNRB of the host country and the fNRB of countries from where woodfuel is imported shall be used to calculate a relevant value for the project activity." We would like to understand the reasoning for excluding the aspect of trade in the determination of fNRB (or, more broadly, why the MoFuSS values are not transferred into the tool in their entirety), especially since the MoFuSS model has established that trade plays a significant role in this: for reference, see the case of Djibouti, for which the fNRB value fell from 61% to only 1% in a scenario in which trade was included (Ghilardi & Bailis, 2024). We urge the SBM to use the full set of default values stipulated in Ghilardi & Bailis (2024), which includes some degree of trade; and update the tool when new iterations of MoFuSS become available. In the event of the old CDM TOOL33 values being kept, which we are in strong disagreement with, we urge the SBM to add a further subparagraph to paragraph 10 to include a provision on fuel imports. This could be integrated alongside the justification for selecting a geographic scale, as stipulated in paragraph 10(b), following our proposed changes to other elements of paragraph 10 (see comment above).	10 (d) How the import of fuels shall be accounted for in the determination of the appropriate default values, if relevant.
5	DEFAULT VALUES FOR FRACTION OF NON-RENEWABLE BIOMASS	Paragraph 16	As the Berkeley Carbon Trading Project website states, "[t]he most robust fNRB assessment to date is a dynamic landscape model commissioned by the United Nations called MoFuSS (Modeling Fuelwood Sustainability Scenarios)". While we	"The default values for fNRB,y provided in Table 2 and Table 3 below are the same as the values listed in the report by Ghilardi & Bailis (2024), including the values for urban environments and sub-national jurisdictions in Table 4 below."

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			welcome that the methodological tool acknowledges the MoFuSS-derived default values as described in Ghilardi & Bailis (2024), we seek clarification regarding the statement that these values are 'based in substantial part' on Ghilardi & Bailis (2024). It remains unclear why the tool does not adopt the values in their entirety. Regional default values deviate only by small percentage points, but we see significant discrepancies at the national level default values which have strong implications for potential over-crediting. The stated rationale of 'conversativeness' is fundamentally untenable given the direction of the adjustments made. We found that the tool's values are identical to those in the CDM TOOL33. By definition, a lower-fNRB value restricts the number of credits issuable, thereby ensuring a more conservative outcome. Consequently, any genuine effort to increase conservativeness would necessitate downward adjustments. Instead, we observed that 46 of the 72 national values in TOOL33 are higher than what is determined in Ghilardi & Bailis (2024). This has a direct impact on issuance volumes: inflating and producing less conservative results. With only 17 values lower and 9 identical, this pattern clearly violates conservativeness principles outlined in the TOOL33's own Appendix 2. There is no logical explanation for this, and the tool failed to provide evidence or documented justification for these deviations.	

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6	DEFAULT VALUES FOR FRACTION OF NON-RENEWABLE BIOMASS	Paragraph 16	We recommend that the tool incorporate the urban fNRB values where appropriate. These are also provided in Ghilardi & Bailis (2024), but omitted in the tool despite being highly relevant. This excerpt of Ghilardi & Bailis (2024) emphasises the importance of including urban values in the tool: "[...] commercially harvested urban woodfuels tend to drive degradation more than woodfuels harvested for subsistence use by rural households because commercial extraction is more intense and spatially focused [36]. We estimate urban fNRB by assuming urban woodfuels originate from high-fNRB administrative units in rural areas and define urban fNRB in each country as the average of the upper 50% percentile of all rural administrative units."	Include and incorporate Ghilardi & Bailis (2024) urban fNRB values: "The default values for fNRB,y provided in Table 2 and Table 3 below are the same as the values listed in the report by Ghilardi & Bailis (2024), including the values for urban environments and sub-national jurisdictions in Table 4 below.
7	DEFAULT VALUES FOR FRACTION OF NON-RENEWABLE BIOMASS	Table 3	We recommend that the tool incorporate the urban fNRB values where appropriate. These are also provided in Ghilardi & Bailis (2024), but omitted in the tool despite being highly relevant. This excerpt of Ghilardi & Bailis (2024) emphasises the importance of including urban values in the tool: "[...] commercially harvested urban woodfuels tend to drive degradation more than woodfuels harvested for subsistence use by rural households because commercial extraction is more intense and spatially focused [36]. We estimate urban fNRB by assuming urban woodfuels originate from high-fNRB administrative units in rural areas and define urban fNRB in each country as the average of the upper 50% percentile of all rural administrative units."	Include and incorporate Ghilardi & Bailis (2024) urban fNRB values (starting on page 31 in G&B, to be found in Table 5: National woodfuel harvests, NRB, and fNRB estimates for the period 2020 to 2030 and standard deviations).

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8	DEFAULT VALUES FOR FRACTION OF NON-RENEWABLE BIOMASS	Table 3	As the Berkeley Carbon Trading Project website states, "[t]he most robust fNRB assessment to date is a dynamic landscape model commissioned by the United Nations called MoFuSS (Modeling Fuelwood Sustainability Scenarios)". While we welcome that the methodological tool acknowledges the MoFuSS-derived default values as described in Ghilardi & Bailis (2024), we seek clarification regarding the statement that these values are 'based in substantial part' on Ghilardi & Bailis (2024). It remains unclear why the tool does not adopt the values in their entirety. Regional default values deviate only by small percentage points, but we see significant discrepancies at the national level default values which have strong implications for potential over-crediting. The stated rationale of 'conversativeness' is fundamentally untenable given the direction of the adjustments made. We found that the tool's values are identical to those in the CDM TOOL33. By definition, a lower-fNRB value restricts the number of credits issuable, thereby ensuring a more conservative outcome. Consequently, any genuine effort to increase conservativeness would necessitate downward adjustments. Instead, we observed that 46 of the 72 national values in TOOL33 are higher than what is determined in Ghilardi & Bailis (2024). This has a direct impact on issuance volumes: inflating and producing less conservative results. With only 17 values lower and 9 identical, this pattern clearly violates conservativeness principles outlined in the TOOL33's own Appendix 2. There is no logical explanation for this, and the tool failed to provide evidence or documented justification for these deviations. We urge the inclusion of the Ghilardi and Bailis values, for the sake of conservativeness and environmental integrity.	Table 3. Default values for fNRB,y at national level, based on Ghilardi & Bailis, 2024.